Timothy W. Miller, Bar No. 5-2704 Senior Assistant Attorney General Wyoming Attorney General's Office 109 State Capitol Cheyenne, Wyoming 82002 (307) 777-5820 (307) 777-8920 Facsimile tim.miller@wyo.gov Thomas W. Rumpke, Bar No. 6-2974 Williams, Porter, Day & Neville, P.C. 702 Randall Ave. P.O. Box 748 Cheyenne, WY 82003 (307) 637-5575 trumpke@wpdn.net

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

JOSHUA BEACHAM,)
Plaintiff,)
V.) Case No. 22-CV-222-ABJ
SCOTT A. STEWARD et al.,)
Defendants.)

JOINT EXPERT DESIGNATION OF INDIVIDUAL AND OFFICIAL CAPACITY DEFENDANTS

Defendants Scott Steward and Joe Torczon, in both their official and individual capacities, designate the following expert witness who may be called to testify at trial:

Sean T. Stewart, CJE, NCCE Stewart Criminal Justice Consulting & Training, LLC. 3564 South Avenida DeLas Palmas Tucson, AZ 8573 (520) 940-4632

Sean T. Stewart is expected to testify in accordance with his report attached hereto as Exhibit "A". Sean T. Stewart's curriculum vitae, publication list, testimony list and fee schedule are attached as Exhibit "B".

GENERAL PROVISIONS

- 1. All opinions of the expert witness designated herein will be given to the requisite degree of probability pursuant to the applicable law in the witness's field of expertise.
- 2. This designation is intended to supplement any and all interrogatories and requests for production of documents propounded by plaintiffs, as well as any deposition of a particular witness.
- 3. The expert listed herein may criticize, comment upon, and/or rebut the deposition testimony, trial testimony, and/or data/reports, written materials and/or any raw data or testing materials produced and/or compiled in this case by the experts or other witnesses designated or called by plaintiff.
- 4. Defendants retain and reserve the right to call and designate any expert designated by any party in this case, whether retained or withdrawn as an expert.
- 5. Defendants retain and reserve the right to supplement this designation of expert witness pending ongoing discovery, or review of additional discovery not yet obtained or which will be provided later in this case.
- 6. Defendants retain and reserve the right to call rebuttal and impeachment experts, even if not currently designated.

DATED this 25th day of August, 2023.

/s/Timothy W. Milller

Timothy W. Miller, Bar No. 5-2704 Senior Assistant Attorney General Wyoming Attorney General's Office 109 State Capitol Cheyenne, Wyoming 82002 (307) 777-5820 (307) 777-8920 Facsimile tim.miller@wyo.gov

Attorney for Individual Defendants

/s/Thomas W. Rumpke

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Attorney for Official Capacity Defendants

CERTIFICATE OF SERVICE

I do hereby certify that on this 25th day of August, 2023, a true and correct copy of the foregoing **Joint Expert Designation of Individual and Official Capacity Defendants** was served as indicated below:

Philip Abromats
Philip E. Abromats, PC
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[**√**] CM/ECF

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[**✓**] CM/ECF

Attorney for Wellpath, LLC, Ashli Carrafa, LPN, and Nancy Wolf, NP

/s/Gabby Sherman

Gabby Sherman, Paralegal
Office of the Wyoming Attorney General